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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

)

)

Tariffs Implementing

)

Access Charge Reform

)

CC Docket No. 97-250

BELL ATLANTIC DIRECT CASE

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Dated: February 27, 1998

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BELL ATLANTIC¹ DIRECT CASE

Introduction and Summary

As documented in this direct case, Bell Atlantic implemented the complex rate structure changes mandated by the Commission on a basis that is consistent with Commission guidance where it was available and on a reasonable basis where no guidance was given. As such, its rates should be approved, or, at most, offsetting adjustments should be made on a prospective basis only, and the investigation order discharged.

The Access Charge Reform Order fundamentally shifted the way local carriers were required to recover their costs for interstate services. As the Commission recognized, this was a "massive restructuring of many interrelated rates." Memorandum

¹ The Bell Atlantic telephone companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-West Virginia, Inc.; New York Telephone Company; and New England Telephone and Telegraph Company. The first seven listed carriers operate subject to the interstate tariff Bell Atlantic FCC No. 1. The other two carriers, the former NYNEX companies, operate subject to the interstate tariff NYNEX FCC No. 1.

Opinion and Order, ¶ 7 (rel. Dec. 30, 1997) ("Investigation Order"). The issues under investigation largely focus on areas where there is no specific Commission rule or guidance in place, and where Bell Atlantic has implemented the requirements of the Access Charge Reform Order in a reasonable manner. As a result, regardless of how the Commission decides the individual methodology questions before it, it should limit changes to prospective adjustments.

While prospective guidance on the issues under investigation will reduce uncertainty, the Commission should recognize that a variety of methods and procedures could result in reasonable rates. There is no basis to reach back and attempt to "correct" the rates for past periods. Those rates were correct given the range of reasonable interpretations of the unprecedented rate adjustments required by the Commission. Once the Commission establishes set procedures and methods, it may narrow the range of rate results it finds reasonable and require conformity with its new requirements on a prospective basis.

If the Commission should nevertheless elect to attempt to undo the impact of carrier decisions made prior to the announcements of the new rules or interpretations, it should avoid penalizing local carriers for failing to anticipate new requirements by allowing them an opportunity to recoup reductions through offsetting rate increases. The Commission properly put access customers on notice that "it may not be possible to achieve a fair balance of ratepayer and shareholder interest" without such an offset. Investigation Order, ¶ 7. Moreover, given that access customers were the beneficiary of any rates that the Commission determines were too low, the balance of the equities in favor of offset or other recoupment is clear.

I. The Commission May Not Retroactively Adjust Rates Based On New Rules.

In the course of deciding here how the access reform changes should be implemented, the Commission cannot apply new or modified requirements to past rates, including those rates under investigation. Because the new rules would “increase a party’s liability for past conduct” and would “impose new duties with respect to transactions already completed,” it would be impermissible retroactive rulemaking.

Landgraf v. USI Film Prods., 511 U.S. 244, 279 (1994); ***see also Association of Accredited Cosmetology Schools v. Alexander***, 979 F.2d 859, 864 (D.C. Cir. 1992).

In key areas of the investigation here, the Bureau has asked for comments on rate adjustments that would impose new ratemaking rules retroactively. For example, with respect to the percentages of non-primary residential lines, the Bureau questions the variations from the numbers it expected, despite the fact that the Commission has not adopted a “uniform nationwide definition” of non-primary residential lines. With respect to calculation of the carrier common line charge, AT&T asks the Commission to impose upon the price cap carriers a “CCL Recalculation Methodology” that would change the price cap formula for the maximum carrier common line charge to take into account the differences between forecasts of base factor portion costs and actual data. And with respect to reallocations of cost among baskets, the Bureau proposes an unprecedented requirement to use basket earnings to calculate Part 69 cost adjustments.

Regardless of the merits of these arguments, in each instance Commission approval would require a new or revised rule. While the Commission can certainly adopt new rules in a properly conducted rulemaking proceeding for making prospective rate adjustments, the fact that the Commission has ordered an investigation does not give the

Commission the power to reach back and require retroactive rate adjustments based on a hitherto unannounced rule.

If the Commission nevertheless were to decide to apply any new rules it did adopt retroactively, it could still avoid giving the rules impermissible retroactive effect if it also allowed offsets that would prevent the new rules from imposing new liabilities on the local carriers for past actions. It would be inequitable for the Commission to give access customers a windfall by requiring a refund for rates found to be too high, but make no compensating adjustment for the offsetting rates found to be too low. This is especially true here, where local carriers had no guidance as to the final rule.

In fact, the Commission itself recognized the problem and expressly put access customers on notice that it may require upward adjustments to some rates to offset any reductions that might be required for other rates. Investigation Order, ¶ 7. If the adjustments are truly offsetting and no new liabilities are created, then there can be no claim that the offsetting adjustments have an impermissible retroactive effect.

II. No Adjustment To Bell Atlantic's Calculation Of Non-Primary Lines Is Required.

Bell Atlantic consistently applied the same definition for non-primary lines that it has advocated throughout the Commission's consideration of this issue. While the Commission may wish to settle on a single definition for future ratemaking, it would be capricious to attempt to impose that definition for periods prior to the rule's effective date. Similarly, there is no basis for the Commission to fault Bell Atlantic because its demand calculation results in a lower percentage of non-primary lines than informal estimates that relied on other definitions.

After adopting the requirement that local carriers charge higher rates to residential customers with non-primary lines, the Commission recognized that that it “must establish criteria to identify primary residential lines,” and it launched a rulemaking to do just that. ***Defining Primary Lines***, 12 FCC Rcd 13647 at ¶ 1 (1997). In that rulemaking, Bell Atlantic proposed the same definition it used in this tariff filing. Bell Atlantic defined a primary line as the first line installed, or designated by the customer, to a billing name at a residential location. Bell Atlantic’s definition is reasonable because it can be applied using existing billing records and because it avoids intrusive data gathering and associated disputes with customers as to whether certain living arrangements constitute a separate household for billing purposes.

That rulemaking to establish a definition of primary residential lines was still pending when the tariff here was required to be filed. The Commission staff instructed local carriers to use any reasonable method to make the required identification. In discussions with Bell Atlantic prior to the tariff filing, Commission staff did not express any concern about use of Bell Atlantic’s proposed definition, which had been under review for three months.

As shown in the attached detailed responses, Bell Atlantic applied reasonable definitions of primary and non-primary lines, and it applied these definitions in an internally consistent manner. The worksheet in Attachment A shows how Bell Atlantic’s definitions would be applied to a hypothetical situation. This demonstrates that the Bell Atlantic definitions can and will be applied consistently to each type of customer account and billing record.

It should not be surprising that the percentage of non-primary residential lines in Bell Atlantic's tariff filing varies from other estimates. Those other calculations were not made for ratemaking purposes using Bell Atlantic's definition. For example, the Bureau cites a Bell Atlantic estimate of 19%. That estimate was not for "non-primary lines," as defined in Bell Atlantic's tariff, but for "additional lines" per location. "Additional lines" include any lines in a given billing location in addition to the first, while "non-primary lines" are defined as additional lines in the same billing location to the same customer name. As is shown in Attachment A, many "additional lines," such as those billed to a tenant in the same location, are properly treated as "primary lines" for purposes of applying access charges. Bell Atlantic compiles estimates of "additional lines" for internal planning purposes and to inform investors of the factors driving the company's growth. While this broad measure of additional lines is relevant for such purposes, it is not useful to identify the number of lines to be billed as "non-primary" under the access reform tariffs.

III. There Is No Basis For Recalculating The Carrier Common Line Charge For Past Understatements of the Base Factor Portion.

The Bureau tentatively concludes that Bell Atlantic's carrier common line rates are unreasonably high because of prior understatements of per-line base factor portion costs. This was based on findings in the 1997 Annual Tariff Investigation Order that Bell Atlantic had under-forecast base factor portion costs in the past. *See Designation Order*, ¶ 35 (rel. Jan. 28, 1998). Bell Atlantic's petition for reconsideration of that order is pending. *1997 Access Tariff*, CC Docket No. 97-149, Bell Atlantic Petition for

Reconsideration (filed Dec. 31, 1997). Regardless of the disposition of that petition, there is no basis for a further rate adjustment here.

The Bureau directs Bell Atlantic and other carriers to use AT&T's "CCL Recalculation Methodology" to calculate the impact of prior year base factor portion forecasts on current carrier common line rates. As shown in Attachment B, AT&T overstates and mischaracterize the impact on the carrier common line charge of differences between forecast and actual base factor portion costs in prior years. This impact is much smaller than AT&T has claimed, and it can produce either a higher or a lower carrier common line charge depending on whether actual base factor portion costs were higher or lower than the previous year's forecast. Moreover, AT&T's method fails to reflect the actual impact of mid-year changes in rates. As a result, AT&T's method adds needless complexity to make negligible changes of questionable accuracy.

More fundamentally, the AT&T methodology cannot be adopted without a change in the price cap rules. In effect, it would add a true-up calculation to the formula in the Commission's price cap rules for the maximum allowable carrier common line charge. The current rules require the base factor portion to be based on a projection. *See* 47 C.F.R. § 69.152(b). The Bureau cannot mandate an adjustment inconsistent with that rule in the context of a tariff investigation. *See* 5 U.S.C. § 553.

If, in a rulemaking proceeding, the Commission does want to adjust its rules to move away from a requirement that carriers base their calculation of base factor portion cost on a projection of what those costs will be in the coming year, it could accomplish its goal far more directly by eliminating the entire projection requirement and simply using the prior year's actual base factor costs to set subscriber line charges and carrier common

line rates. This would be far more accurate than AT&T's proposal, and it would avoid the endless efforts of the long distance carriers to dispute local carriers' projections.

IV. The Commission's Rules And The Access Charge Reform Order Allow The Local Exchange Carriers To Reallocate Costs Based On The Cost of Capital.

The Bureau should not adopt its tentative conclusion that the local exchange carriers should reallocate switch port costs among baskets using revenues, or basket rates of return, rather than costs at the authorized rate of return. The Access Charge Reform Order was quite clear in requiring the local exchange carriers to reassign costs among baskets and service categories. *See, e.g., Access Charge Reform Order*, ¶ 125. Neither revenues nor basket earnings represent the costs that the local exchange carriers incur. The authorized rate of return adopted by the Commission was designed to reflect an estimate of the carriers' cost of capital in providing service. For this reason, as shown in Attachment C, the carriers have consistently used the authorized rate of return in calculating exogenous cost adjustments, and the Commission has approved this methodology on numerous occasions. In addition, as the Bureau recognizes, use of actual basket earnings to shift line port costs from local switching to the common line category would be inconsistent with the Commission's method for setting end user common line charges, which is based on a projection of base factor costs for the tariff year using the authorized rate of return.

If the Bureau decides that a different methodology should be used for the purposes of access charge reform, it cannot find that Bell Atlantic's use of costs at the authorized rate of return in the January 1, 1998 tariffs was unreasonable, since the

Commission has approved this methodology for numerous exogenous cost adjustments in the past. Any change should be prescribed only on a forward-looking basis. Retroactive changes would make little sense, since the changes would primarily shift revenues from one set of per-minute rates (the local switching charges) to another set of per-minute rates (the carrier common line charges), resulting in little net impact on an interexchange carrier's bill for access charges.²

V. Bell Atlantic Properly Followed The Access Charge Reform Order In Reallocating Costs Among Baskets, Service Categories, and Rates.

As is demonstrated in the attachments hereto, Bell Atlantic properly followed the Commission's directions in the Access Charge Reform Order in reallocating costs among baskets, service categories, and rate elements.

The Designation Order required Bell Atlantic-South to explain why the SS7 costs that it removed from the transport interconnection charge were 28 percent of total tandem switched revenue requirements, while SS7 was about 10 percent for most companies. In Attachment D, Bell Atlantic demonstrates that the correct figure is 24 percent, and that it is greater than the percentage for other companies because Bell Atlantic-South has more LATAs, each of which requires at least a pair of SS7 signaling transfer points, and because Bell Atlantic-South has deployed SS7 capabilities more broadly and more

² Although Bell Atlantic disagrees with the Bureau's tentative findings, considering the large amount of revenues at issue if the Bureau later decides that the local exchange carriers should have used revenues as a basis for reallocating switch port costs to the common line category, Bell Atlantic may file an interim tariff revising the exogenous cost changes for switch ports to reallocate costs based on local switching revenues.

quickly than other companies (and has deployed more advanced intelligent network (“AIN”) features with SS7).

The Designation Order also required the local exchange carriers to provide additional information about how they removed central office equipment maintenance costs and marketing costs from the TIC. In Attachment E, Bell Atlantic explains that it removed central office equipment maintenance costs from the transport interconnection charge by removing costs from the transport basket and then applying the resulting reduction in the transport price cap index to the transport service band indexes, as required by the Commission's price cap rules. Bell Atlantic removed marketing expenses from the trunking basket based on the relative distribution of switched transport services within that basket, since the Access Charge Reform Order stated that these costs should not be removed from Special Access services. This methodology removed a marketing expenses from the TIC based on the proportion of TIC revenues to total switched transport revenues in the basket. Contrary to AT&T's claims, Bell Atlantic also removed an appropriate amount of these costs from the facilities-based portion of the TIC.

In Attachment F, Bell Atlantic explains why the Bureau should not require the local exchange carriers to use 1993 rates and the 1993 mix of DS1 and DS3 facilities to determine the effect on the tandem switched transport rates of replacing the assumed 9,000 minutes of use per voice grade trunk with the prior year's actual minutes of use on tandem-switched transport facilities. Contrary to the Bureau's belief, Bell Atlantic's actual minutes of use for tandem switched transport facilities were less than 9,000 per month, resulting in a reduction in the TIC, just as the Commission anticipated in the

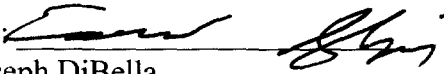
Access Charge Reform Order. In addition, the Bureau's proposed methodology could produce unexpected results. In some cases, it can cause the TIC to increase.

Finally, Bell Atlantic demonstrates in Attachment G that it reasonably used 1996 base period end user data from the Tariff Review Plan to allocate universal service contributions among the price cap baskets. Using the distribution of end user revenues among baskets as reported in the Universal Service Fund Worksheet, Form 457, would be less consistent and therefore less accurate, since Form 457 reports 1997 revenues, while the price cap index changes are calculated as changes to base year 1996 rates times demand.

Conclusion

Bell Atlantic's access reform tariffs are consistent with the rules and cost allocation methodologies adopted in the Access Charge Reform Order. If the Commission changes those rules or methodologies, it should require rate changes only on a prospective basis.

Respectfully submitted,

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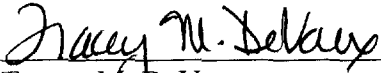
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Dated: February 27, 1998

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of February, 1998 a copy of the foregoing "Bell Atlantic's Direct Case" was sent by first class mail, postage prepaid, to the parties listed on the attached list.


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Subject: Non-Primary Residential Lines

Issue 1: Explain why Bell Atlantic's definition of primary vs. non-primary residential lines is reasonable. (¶ 17)

Response:

In the Designation Order, the Bureau recognized that the Commission has not yet adopted a definition of primary and non-primary residential lines, and that, pending completion of the Commission's rulemaking proceeding to adopt a uniform definition, the local exchange carriers were required to adopt reasonable definitions for purposes of their access charge reform tariffs. Designation Order, ¶ 6. The Commission therefore contemplated that the local exchange carriers might adopt different definitions, and that the definitions would not be overturned if they fell within a range of reasonableness. The Designation Order notes that the local exchange carriers might be required to change their definitions prospectively once the Commission completes its rulemaking proceeding, not retroactively. However, the order also states that the Bureau will consider whether the local exchange carriers applied their definitions "consistently." Designation Order, ¶ 14. Therefore, the only relevant issues are (1) whether the local exchange carrier adopted a reasonable definition; and (2) whether the carrier applied that definition on an internally consistent basis. As is shown below, Bell Atlantic passes both tests.

In its tariff, Bell Atlantic applied the following definitions of primary residential lines;

PRIMARY LINE

Residential subscriber line of a billing name customer, at a single service address, which is any of the following:

1. the only line provided to a residential customer (billing name) at that location;
2. the line designated as primary by the billing name customer at the point of ordering service; or
3. where a billing name customer has not designated a line, the first line installed by Bell Atlantic or by any carrier reselling Bell Atlantic's line.

In the Commission's rulemaking proceeding to define primary lines, CC Docket No. 97-181, Bell Atlantic provided the following justification for its definition of primary residential lines;

This clear and simple definition has many advantages. First, because it is precise and not subject to interpretation, it will avoid inconsistent treatment among customers. Second, as discussed more fully below, it will allow carriers to make the initial determinations based on existing records. Third, it avoids measures that require intrusive information gathering into the private living arrangements of its customers.

The definition also avoids the creation of an adversarial relationship between a carrier and its customers. Bell Atlantic should not be put into the position of policing the compliance of its customers. By relying on existing billing data as the basis of the differentiation, there is no need to try to obtain additional information otherwise unrelated to phone service.

At the same time, by ignoring individual living arrangements, the proposal avoids penalizing individuals who could be inappropriately classified as non-primary line customers with a broader measure. For example, if there are multiple independent subscribers living in a single address, with separate lines provided to two or more of the residents under separate billing names, this definition would allow each subscriber to have his/her own phones treated as his/her primary line. Thus, if an elderly parent boards with his/her children, each can independently have his/her own primary line.

If, on the other hand, that same family acts as a single household in their purchase of phone service and puts two or more lines under a single billing name, then only one line would be designated as primary and the others would be treated as non-primary. In both situations, the differentiation required in the Commission's non-primary line policy is accomplished without the need to obtain

any information concerning the personal living arrangements as distinctions are based on the actual service choices made by the customer.

By limiting the identification to a single address, the proposed definition would not capture all service to second homes as non-primary. This is a reasonable accommodation given the daunting task of identifying customers with second homes. While some customers may have more than one home served by the same local carrier, others will have multiple homes served by multiple local carriers. There is no way to both simplify the methodology, and to capture and keep current the necessary data on those customers. Even if only one carrier were involved, it could be an impossible task to ascertain if identical names were the same or different people. The Notice cites proposals for the creation of a national data base,¹ but such a data base would require phone companies to collect and store intrusive information about every residential customer in the country. It would also require a number of unaffiliated carriers to have access to that data base, thereby gutting the current restrictions on releasing customer proprietary network information ("CPNI"), particularly where customers have unlisted or unpublished numbers. The social costs of such a big brother approach would far outweigh any potential benefit of capturing the relatively small number of second home owners. Even beyond the social cost, the possibility of error is much higher once the Commission requires carriers to act based not only on data they collect, but to correlate their own results with data collected by other carriers. . . . Using a simplified identification method will allow for the initial identification of primary lines to be made through existing customer billing records. Computer searches of existing records could identify those residential customers with one line, or the first line installed among multiple lines.² Once the initial determinations are made, customers with new connects and transfers could make new or modified designations as part of their initial contact with the local carrier's business office, thereby allowing customer input without generating significant additional costs.³

For these reasons, Bell Atlantic's definition of primary residential lines is reasonable. As such, it is a lawful definition, regardless of whether other carriers used different definitions or whether it matches the definition that the Commission eventually

¹ Notice [12 FCC Rcd 13647], ¶ 12.

² While Bell Atlantic has informally estimated sales of additional lines for marketing purposes, the underlying tracking has only been applied to new purchases and cannot address existing customers. Moreover, estimates have not been tied to a specific regulatory definition of non-primary lines.

³ Defining Primary Lines, CC Docket No. 97-181, Comments of Bell Atlantic, pp. 3-4, 6 (filed Sep. 25, 1997).

adopts in the pending rulemaking proceeding. The data provided below show that Bell Atlantic applied this definition reasonably, and consistently with its billing data.

Issue 2: Identify the number of lines in each of the following categories: (1) primary residential lines; (2) single-line business lines; (3) non-primary residential lines; and (4) BRI ISDN lines. (¶ 17)

Response:

The number of lines in each of the requested categories follow. These numbers were used in our December 17, 1997 filing and represent total demand (12 months) in each category for base year 1996.

1. Primary Lines:	255,231,789
2. Single Line Business:	11,798,412
3. Non-Primary Residence Line:	23,019,704
4. BRI ISDN:	<u>3,418,970</u>

To develop non-primary residential lines for purposes of the tariff filing, Bell Atlantic applied the new tariff definition as follows:

- First, using customer billing records, Bell Atlantic ran a report which provided the number of residential additional lines billed to the same billing name customer, at a single service address, on the same account as the primary line.
- Second, Bell Atlantic currently does not have an account identifier in its billing records that identifies the number of residential additional lines that are billed to the same billing name customer, at a single service address, on a different account. Bell Atlantic used a special

study of all residential subscriber lines in New Jersey, which identified such additional lines, as a surrogate for the proportion of non-primary lines in this category in the Bell Atlantic region.

In the Designation Order, the Bureau states that non-primary residential line percentages were lower than the Commission expected, citing industry data such as Bell Atlantic's public statement that it had achieved additional residential line penetration of 19 percent. *See* Designation Order, ¶ 16. That penetration rate is different from the percentages of non-primary residential lines for Bell Atlantic shown in paragraph 7 of the Designation Order because the two penetration rates were based on different definitions of non-primary lines. The 19 percent figure assumes that every line in a location except the first installed is an "additional line." This was done to highlight the extent to which line growth is much higher for additional lines at existing locations than for initial lines new locations. Such information is important for purposes of planning network infrastructure and for identifying the factors that are driving growth for additional lines at a location, such as growth in Internet access, in-home businesses, and non-traditional living arrangements. This information is also important for financial and marketing purposes, because it indicates the extent to which the company's financial results are being affected by changes in the marketplace, and how the company needs to respond in marketing its services. As such, this definition of "additional lines" need not and does not coincide with the way that "non-primary lines" are defined in the tariff.

In the access charge reform tariff, Bell Atlantic applied its new definition of non-primary residential lines to implement the Commission's access reform rules. This definition treats an additional line in a location that is billed to a different customer name as a primary residential line. Since relatives, roommates, sub-tenants, etc., at a billing location often order additional lines in their own names, many of the "additional" lines in the 19 percent figure will be billed as primary residential lines under Bell Atlantic's access reform tariffs. Because these individuals have independent accounts with Bell Atlantic, it is appropriate that they be treated independently from other customers at the same address.

The attached worksheet demonstrates this difference. The worksheet shows that Bell Atlantic's access tariff definition of non-primary lines would treat three of the eight lines as non-primary residential lines. In contrast, six of the eight would be considered "additional lines," because only the first line in each of the two billing addresses would be considered the initial telephone line. This results in a substantially higher percentage of lines being counted as "additional lines."

For purposes of determining the number of additional lines that have been sold, there is no need to determine whether a second line at a customer location is billed to a different customer name. However, for purposes of applying access charges to billing data, Bell Atlantic treats the first line to a different customer name as a primary line. To do otherwise would require intrusive inquiries into the relationships between customers to determine if they represent a single "household."

Issue 3: Using the worksheets in Appendix B, delineate what, how, and in which order data were sorted and used in accordance with Bell Atlantic's definition to arrive at the primary and non-primary residential line count totals submitted pursuant to the Designation Order. (¶ 17)

Response:

See the following worksheets, which use the coding provided in the Designation Order.

Appendix B
Page 1

WORKSHEET

Using the codes and worksheets provided on Pages 2 and 3, indicate the criteria used in determining line counts by following the examples on Page 4.

I. Line Count Data Formation
(Use All that apply.)

II. Line Count Data Identification
(Report in Classification Sequence.)

	<u>Data</u>			Time Period	<u>Criteria</u>			
	Sources	Search	Collection		First	Second	Third	Fourth
Primary Residential Lines	D1 D8	S1 S3	C2	T1	L2	B1	A3	
Single Line Business								
BA-north	D1	S1	C2	T2 (Jan-Dec '96)		N0*		
BA-south	D1	S1	C2	T1 (Dec '96)		N0*		
Non-Primary Residential Lines	D1 D8	S1 S3	C2	T1	L2	B1	A3	
BRI - ISDN Lines								
BA-north	D1	S1	C2	T2 (Jan-Dec '96)		N0**		
BA-south	D1	S1	C2	T1 (Dec '96)		N0**		

* Monthly SLB SLC Revenue/SLB SLC Rate

** USOC count in billing database

ATTACHMENT A

Page 9 of 9

Appendix B Page 5

WORKSHEET

Implementation of Definition - Based on your **RESIDENTIAL LINE** definitions, please classify the data in the last column below as a **P** for Primary Residential or **NP** for Non-Primary Residential lines. You may add columns and/or show additional criteria needed to illustrate the implementation of your line definitions.

<u>Customer</u>	<u>Billing/ Account No.</u>	<u>Line Location</u>	<u>Phone Numbers</u>	<u>Installation Date (Order)</u>	<u>Service/Inv. Work Order No.</u>	<u>Billing Address</u>	<u>P/NP Decision</u>
N. Adams	555-1111 6789 555-1112	123 Elm #1	555-1111	1/1/96 (1) 1/1/96 (2)	6789 - 1111 6789 - 1112	P.O. Box 123	P NP
P. Adams	555-2222 6789	123 Elm #1	555-2221 555-2222	5/5/96 4/5/96	6789 - 2221 6789 - 2222	P.O. Box 123	NP P
P. Adams	555-3333 4567	123 Elm #2	555-3333	3/3/96	4567 - 3333	P.O. Box 123	P
P. Boyd-Adams	555-4444 5678	123 Elm #2	555-4444 555-4448	4/5/96 7/5/96	5678 - 4444 5678 - 4448	P.O. Box 123	P NP
F. Boyd-Adams	555-4447 5678	123 Elm #2	555-4447	5/5/96	5678 - 4447	P.O.	P